



# ANTI-COMPETITIVE BEHAVIOUR POLICY

Doc No.: IM/SM/ACB

Rev No./DT: 00/01.04.19

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## **Purpose:-**

WTE is committed to conducting its operations with integrity and in a manner that is consistent with laws and business practices that are aimed at fostering an open, competitive and fair market environment and which will best serve the long term interests of our customers, our stakeholders and the wider community.

The purpose of this Policy is to set out WTE's approach to anti-competitive behaviors. WTE is committed to dealing fairly and honestly with our customers, suppliers, competitors and any other business partners and the community (collectively "**Stakeholders**")

## **Scope**

This Policy applies to WTE and all WTE employees (including, but not limited to non-executive directors, permanent, casual, fixed term employees and temporary workers) ("**Employees**" or "**you**"). Compliance with this Policy is mandatory.

## **Principles**

The key principles which guide WTE's approach to anti-competitive behavior are as follows:

- Conduct that is strictly prohibited such as:
  - Cartel conduct and collective boycotts between competitors, including price fixing, market sharing or allocation arrangements, bid rigging and arrangements aimed at restricting outputs or supply; and
  - Conduct affecting the supply chain such as resale price maintenance and third line forcing;
- Conduct that is prohibited if it has the purpose of limiting or preventing competitors from entering or competing in markets such as misuse of market power; and
- Unfair conduct, including:
  - Misleading or deceptive conduct
  - Unconscionable conduct against businesses or consumers; and

Non-compliance with the consumer guarantees and unfair contract terms regimes

## **Raising Concerns**

If an Employee or Stakeholder becomes aware of any anti-competitive behavior, then they should raise their concern:

- To WTE's support team by emailing [help@wteinfra.com](mailto:help@wteinfra.com)



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## **Policy Compliance**

WTE encourages its staff to be vigilant and proactive in circumstances where they have concerns about conduct and encourages Employees to escalate any such concerns they might have to their line Manager. If an Employee is not comfortable with escalating to their line Manager, they are encouraged to report the incident in accordance with WTE's Whistleblower Policy.

## **Review**

This Policy is reviewed and updated:

- When applicable and appropriate including when there are relevant changes in business practice, legislation and compliance obligations; and
- At least every two years.

A handwritten signature in blue ink, appearing to read 'Prasad Kulkarni', is written over a large, stylized blue circular mark.

Prasad Kulkarni

CFO

Date: 01.04.2019